## EXHIBIT 12

From: Sharko, Susan M

Sent: Tuesday, March 26, 2019 4:08 PM

To: 'Leigh O'Dell' < Leigh. ODell@Beasley Allen.com >; 'Michelle Parfitt' < mparfitt@ashcraftlaw.com >

Cc: 'Locke, Thomas T' < TLocke@seyfarth.com>
Subject: RE: Talc Daubert: Longo/Rigler follow-up

## Following up on this....

From: Sharko, Susan M

Sent: Friday, March 15, 2019 1:03 PM

To: 'Leigh O'Dell' < Leigh. ODell@BeasleyAllen.com >; Michelle Parfitt < mparfitt@ashcraftlaw.com >

**Cc:** Locke, Thomas T < <u>TLocke@seyfarth.com</u>> **Subject:** RE: Talc Daubert: Longo/Rigler follow-up

## thanks

From: Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>

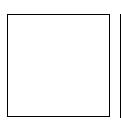
Sent: Friday, March 15, 2019 12:56 PM

To: Sharko, Susan M < Susan.Sharko@dbr.com >; Michelle Parfitt < mparfitt@ashcraftlaw.com >

**Cc:** Locke, Thomas T < <u>TLocke@seyfarth.com</u>> **Subject:** RE: Talc Daubert: Longo/Rigler follow-up

Susan, Dr. Longo has been out of pocket in depositions and trial. I will follow up with him and get back to you next week.

Thanks, Leigh



## P. Leigh O'Dell

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From: Sharko, Susan M <Susan.Sharko@dbr.com>

Sent: Thursday, March 14, 2019 1:39 PM

To: Leigh O'Dell < Leigh. ODell@BeasleyAllen.com >; Michelle Parfitt < mparfitt@ashcraftlaw.com >

**Cc:** Locke, Thomas T < <u>TLocke@seyfarth.com</u>>; Sharko, Susan M < <u>Susan.Sharko@dbr.com</u>>

Subject: RE: Talc Daubert: Longo/Rigler follow-up

Following up on this – we really should not have to bother Judge Pisano with things like this, but will have not choice if we don't get the materials this week.

From: Sharko, Susan M

Sent: Friday, February 15, 2019 6:15 AM

**To:** 'Leigh O'Dell' < Leigh.ODell@BeasleyAllen.com'>; Michelle Parfitt < mparfitt@ashcraftlaw.com'> **Cc:** Locke, Thomas T < TLocke@seyfarth.com'>; 'Mark Silver' < MSilver@coughlinduffy.com'>; Michael

Klatt (<u>mklatt@grsm.com</u>) < <u>mklatt@grsm.com</u>> **Subject:** FW: Talc Daubert: Longo/Rigler follow-up

Formalizing the requests made at the depositions of Dr. Longo and Dr. Rigler. Please produce these documents as soon as possible in the next few days. Thank you.

- The underlying data generated by the third-party lab that MAS relies upon in its report, J3 Resources Inc., in connection with the analysis of samples in this case. (See Dr. William Longo Deposition, at 34:12-35:2.) It appears that plaintiffs produced only the MAS material.
- The key which lists samples analyzed by J3 Resources in connection to this case and their MAS sample number equivalents. (See Dr. William Longo Deposition, at 304:6-304:24.)
- Any SAED calculations or data generated by MAS in addition to the SAED diffraction verifications. To the extent calculations or other data were generated in addition to the SAED diffraction verifications. (See Dr. Mark Rigler Deposition, at 124:23-125:11.)
- The weight percentage standards used in connection with the PLM analysis of samples in this case. (See Dr. William Longo Deposition, at 270:2-270:16.)

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